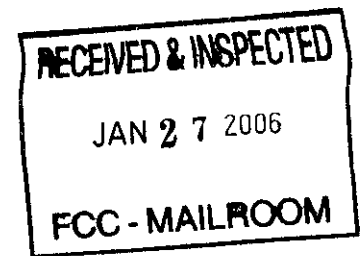


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Before the
Federal Communications Commission
Washington, D.C. 20554



In re Petition of:)
)
Octatron, Inc. and Chang Industry, Inc.) ET Docket No. 05-356
)
)
For Waiver of Sections 15.247(b),)
15.247(e) and 15.249(a) of the Rules)
and Regulations)

To: Commission Secretary, Office of the Secretary
Federal Communications Commission

OBJECTION TO PETITION

1. The undersigned, Sensus Metering Systems Inc. ("Sensus"), designs and sells RF utility meter reading data transmission systems that operate at 902-928 MHz. Sensus objects to the allowance of any portion of the request by Petitioners Octatron, Inc. and Chang Industry, Inc. for a waiver of Sections 15.247(b), 15.247(e) and 15.249(a) of the Rules and Regulations because any interference caused by Petitioners' surveillance systems will disrupt the operation of the Sensus systems in the vicinity and corrupt the data transmitted.
2. Petitioners have acknowledged that their surveillance systems operating at one watt can create interference of unspecified intensity in an area of unspecified size (Petition, paragraphs 6 and 13) for at least two hours (Petition, paragraph 13). However, Petitioners have provided no data or limits (for example, no spectral density limit) to demonstrate that the operation of their surveillance systems will not have a deleterious effect on the operation of other services using the same space. Such a demonstration is necessary.
3. The ISM band (Industrial, Scientific and Medical) is shared by a diverse number of users. The Government has the first priority followed by radio amateurs and LMS (Location and Monitoring Systems). Part 15 (non-licensed devices) is at the bottom of the list of priorities. During the deliberations of establishing the rules for spread spectrum transmitters (part 15.247) there were many companies that participated with comments and provided detailed engineering studies pertaining to the safe levels of transmission to

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avoid interference. Many of those companies pushed for higher spectral density, not unlike Petitioners' waiver request in the instant Petition. However, the engineering office of the FCC rejected such requests after engineering studies indicated that the spectral density and the transmission levels now in the rules were the maximum acceptable. Furthermore, the FCC reserved the right to, and warned that in the future it may, reduce the power levels if it was proven that Part 15 devices caused interference to the primary users of the band.

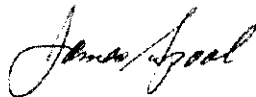
4. Sensus believes that, through the utilization of spread spectrum technology, Petitioners could market video surveillance systems under the FCC rules in Part 15.247 without the necessity of a waiver. Such a system would provide very secure communication over substantial distances without detrimental interference, and without the possibility of being jammed either deliberately or accidentally by other operations in the band.

5. The deliberations for the final rules were initiated in 1987 and it was not until mid 1990 when an agreement was reached. The final rules were released on July 9, 1990, under docket No. 89-354. In seeking a waiver without providing engineering studies to demonstrate that interference from their transmissions will not affect other users of the band, Petitioners are simply requesting the FCC to reverse its decision and throw away the rules that took quite a lot of a serious and painstaking effort to establish, merely because the Petitioners' surveillance systems are useful.

6. Accordingly, for the reasons set forth above, Sensus recommends that the FCC rejected the Petitioners request for a waiver of Sections 15.247(b), 15.247(e) and 15.249(a) of the Rules and Regulations.

Respectfully submitted:

Sensus Metering Systems Inc.



Vice President and General Counsel

January 26, 2006

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